RENE L. VALLADARES
Federal Public Defender
State Bar No. 11479
LARONDA MARTIN
Assistant Federal Public Defender
411 E. Bonneville, Ste. 250
Las Vegas, Nevada 89101
(702) 388-6577/Phone
(702) 388-6261/Fax
LaRonda Martin@fd.org

Attorney for Christian Contreras

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

V.

Case No. 2:16-cr-00044-JCM-BNW-1

STIPULATION TO CONTINUE
REVOCATION HEARING
(Third Request)

Defendant.

IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson, United States Attorney, and Allison Reese, Assistant United States Attorney, counsel for the United States of America, and Rene L. Valladares, Federal Public Defender, and LaRonda Martin, Assistant Federal Public Defender, counsel for Christian Contreras, that the Revocation Hearing currently scheduled on June 23, 2023, be vacated and continued to a date and time convenient to the Court, but no sooner than one hundred and twenty (120) days.

This Stipulation is entered into for the following reasons:

1. Defendant Christian Salvador Contreras was formally indicted in a new federal case on December 13, 2022. He is charged with one count of Carjacking in violation of 18

¹ EM/CEF 2:22-CR-00278-CDS-DJA-1.

26

U.S.C. § 2119, one count of Discharging a Firearm During and in Relation to a Crime of Violence in violation of 18 U.S.C. § 924(c)(1)(A)(iii), and one count of Prohibited Person in Possession of a Firearm in violation of 18 U.S.C. § 922(g).²

- 2. A Superseding Indictment was filed on January 4, 2023³ and the arraignment⁴ for said Indictment was held on January 11, 2023 before the Honorable Magistrate Judge Nancy J. Koppe.
- 3. Defense counsel and Mr. Contreras need additional time to review the discovery in the new case, investigate the case, develop a trial strategy, and discuss all constitutional rights related to both the trial and the final revocation hearing.
- 4. Counsel for Mr. Contreras will also be out of the district and serving as faculty for the Deryl Dantzler Trial Practice Institute (also known as the National Criminal Defense College) from June 17, 2023 through June 24, 2023 in Fairfax, Virginia.
 - 5. The defendant is in custody and agrees with the need for the continuance.
 - 6. The parties agree to the continuance.

This is the third request for a continuance of the revocation hearing.

DATED this 12th day of June, 2023.

RENE L. VALLADARES Federal Public Defender JASON M. FRIERSON United States Attorney

By <u>/s/ LaRonda Martin</u>

LARONDA MARTIN Assistant Federal Public Defender By /s/ Allison Reese
ALLISON REESE
Assistant United States Attorney

² EM/CEF 2:22-CR-00278-CDS-DJA-1, Doc. 1.

³ EM/CEF 2:22-CR-00278-CDS-DJA-1, Doc. 17.

⁴ EM/CEF 2:22-CR-00278-CDS-DJA-1, Doc. 20.

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

V.

CHRISTIAN CONTRERAS,

Defendant.

Case No. 2:16-cr-00044-JCM-BNW-1

ORDER

IT IS THEREFORE ORDERED that the revocation hearing currently scheduled for Friday, June 23, 2023 at 10:30 a.m., be vacated and continued to **October 23, 2023, at 10:00 a.m.**; or to a time and date convenient to the court.

DATED June 12, 2023.

UNITED STATES DISTRICT JUDGE